

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JEROME O'HARA,

BERNADETTE O'HARA,

O'HARA FAMILY PARTNERSHIP,

ELIZABETH SARRO,

GEORGE PEREZ, and

JEANETTE PEREZ,

Defendants.

Adv. Pro. No. 10-04272 (SMB)

**STIPULATION AND ORDER FOR EXTENSION OF TIME TO  
RESPOND AND TO ADJOURN THE PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein,  
that the time by which Defendants Jerome O'Hara ("O'Hara"), Bernadette O'Hara, George Perez  
("Perez"), and Jeanette Perez (collectively, "Defendants") may move, answer, or otherwise

respond to the Trustee's complaint (the "Complaint") is extended up to and including September 15, 2015. The pre-trial conference will be adjourned to November 18, 2015, at 10:00 a.m.

On or about March 17, 2010, the United States filed indictment 10 Cr. 228 (LTS) in the United States District Court for the Southern District of New York charging O'Hara and Perez with conspiracy to commit securities fraud, falsify records of a broker-dealer, and falsify records of an investment advisor, in violation of 18 U.S.C. § 371; falsifying records of a broker-dealer, in violation of 15 U.S.C. §§ 78(a) and 78ff, 17 C.F.R. § 240.17a-3, and 18 U.S.C. § 2; and falsifying records of an investment advisor, in violation of 15 U.S.C. §§ 80b-4 and 80b-17, 17 C.F.R. § 275.204-2, and 18 U.S.C. § 2 (the "Criminal Case").

On November 19, 2010, the Trustee commenced an adversary proceeding, styled *Picard v. O'Hara et al.*, Adv. Proc. No. 10-04272 (BRL), by filing the Complaint in the United States Bankruptcy Court for the Southern District of New York against Defendants. Counsel for O'Hara and Perez requested a stay of the adversary proceeding pending resolution of the Criminal Case.

The purpose of this stipulated extension ("Stipulation") is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. Nothing in this Stipulation is a waiver of Defendants' right to request from the Court a further extension of time to answer, move against, or otherwise respond and/or the Trustee's right to object to any such request.

The parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction. Upon notice to Defendants, nothing in this Stipulation waives the Trustee's right to request from the Court an order to

require Defendants to answer, move against, or otherwise respond to the Complaint and to attend a pre-trial conference prior to November 18, 2015.

Dated: July 13, 2015  
New York, New York

BAKER & HOSTETLER LLP

By: /s/ David J. Sheehan  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Keith R. Murphy  
Email: kmurphy@bakerlaw.com  
Ona T. Wang  
Email: owang@bakerlaw.com

*Attorneys for Plaintiff Irving R. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
Bernard L. Madoff*

THE LAW OFFICES OF GORDON MEHLER, PLLC

By: /s/ Gordon Mehler  
747 Third Avenue, 32nd Floor  
New York, New York 10017  
Telephone: (212) 661-2414  
Facsimile: (212) 661-8761  
Gordon Mehler  
Email: gmehler@mehlerlaw.com

*Attorneys for Defendants Jerome O'Hara and  
Bernadette O'Hara*

KRANTZ & BERMAN, LLP

By: /s/ Larry H. Krantz  
747 Third Avenue, 32nd Floor  
New York, New York 10017  
Telephone: (212) 661-0009  
Facsimile: (212) 355-5009  
Larry H. Krantz  
Email: lkrantz@krantzberman.com

*Attorneys for Defendants George Perez and  
Jeanette Perez*

SO ORDERED

Dated: July 14<sup>th</sup>, 2015  
New York, New York

/s/ STUART M. BERNSTEIN  
HON. STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE